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Attorneys for Defendant NORTHSTAR LOCATION SERVICES, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NICOLE DIANE LA CARIA, on behalf of
herself and all others similarly situated;

Plaintiff,

vs.

NORTHSTAR LOCATION SERVICES, LLC,
A New York limited liability company, and
JOHN DOES 1-10.

Defendant.

Case No.: 2:18-cv-00317-GMN-GWF

Honorable Gloria M. Navarro

Magistrate Judge George Foley, Jr.

**STIPULATION TO EXTEND DEADLINE
TO AMEND PLEADINGS AND ADD
PARTIES**

(First Request)

Pursuant to Local Rule of Practice 26-4, plaintiff Nicole Diane La Caria (“Plaintiff”) and defendant Northstar Location Services, LLC (“Northstar”) (hereinafter collectively referred to as the “parties”), by and through their respective counsel of record, hereby stipulate to extend the deadline to amend pleadings and add parties from June 15, 2018 to August 15, 2018.

On February 21, 2018, Plaintiff filed her underlying complaint. (Dkt. No. 1). Unclear of the identities of some of the Defendants, Plaintiff pled claims against Northstar and John Does 1-

1 10. *Id.* On May 3, 2018, the operative scheduling order was put into effect. (Dkt. No. 9). Pursuant
2 to Local Rule of Practice 26-1, and the scheduling order, the deadline to amend pleadings and add
3 parties is June 15, 2018. *Id.* On April 26, 2018, Plaintiff propounded discovery requests on
4 Northstar and requested available deposition dates. On May 18, 2018, Plaintiff noticed Northstar's
5 30(b)(6) deposition for June 6, 2018.

6 Northstar notified Plaintiff that its 30(b)(6) witness is not available in May and will be out
7 of the office on medical leave in June. As such, the earliest date that Northstar's 30(b)(6) witness
8 can be deposed is in July of 2018.

9 Discovery is in the beginning stages. The scheduling order went into effect earlier this
10 month. Plaintiff recently propounded her initial round of discovery requests and noticed her first
11 deposition. Northstar has not yet propounded discovery on Plaintiff nor noticed any depositions,
12 but intends to. Depending on the discovery produced, Plaintiff may seek additional discovery and
13 do one or two additional depositions.

14 This request is made less than 21 days before expiration of the June 15, 2018 amended
15 pleading deadline. Good cause exists to extend the deadline. Plaintiff needs Northstar's discovery
16 responses and deposition testimony to identify John Does 1-10, to add their names to the caption,
17 and to identify further claims against Northstar. However, Northstar's 30(b)(6) witness is
18 unavailable until July due to a medical situation. Based on the foregoing, the parties stipulate to
19 extend the deadline to amend parties and add claims from June 15, 2018 to August 15, 2018.

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Both parties anticipate completing discovery within the remaining deadlines.

Plaintiff:

DATED this 5th day of June, 2018

GESUND & PAILET, LLC

By: /s/ Keren E. Gesund, Esq.
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Defendant:

DATED this 5th day of June, 2018

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 6/06/2018